

From: Matthew Hardin matthewdhardin@gmail.com
Subject: Re: Declaration re: Fees and Costs
Date: February 10, 2025 at 11:15 AM
To: Russell Greer russmark@gmail.com
Bcc: Joshua Moon jcmoon@pm.me

MH

Good morning, Mr. Greer.

I note that our motion for fees in this case is due tomorrow if we have not reached a stipulation. As indicated previously, if I am forced to file a motion, our costs will necessarily escalate as such a motion will require more of my time at \$300 per hour.

Best,

Matthew D. Hardin

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On Jan 17, 2025, at 2:50 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer.

Pursuant to the Court's Order at ECF No. 218, please see attached my declaration relating to costs and fees incurred. The total amount reflected as being due as of this moment is \$5,559.76. Note that this amount relates to the show cause regarding your initial disclosures only, and does not relate to any other discovery dispute relating to the request, including those which remain outstanding relating to requests for production of documents.

Also note that we are entitled to additional funds for the reasons set forth in paragraph 15 if you elect to force us to file additional pleadings, including but not limited to any formal motion to force payment of these sums or any response to objections you file with the District Court.

We look forward to your cooperation with the magistrate's order and expect you will want to discuss a stipulation within the next 14 days. If you do not wish to discuss a stipulation, of course, the amount due will go up with further proceedings.

Best,

<Declaration Fees Moon Greer with exhibits.pdf>

Matthew D. Hardin

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